



December 7, 2021

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street N.E.
Washington, D.C. 20554

**Re: Draft Order and Notice of Proposed Rulemaking, IB Docket No. 21-456,
RM-11855**

Dear Ms. Dortch:

On December 6, 2021, SES Americom, Inc. and O3b Limited (collectively, “SES”) discussed the draft Order and Notice of Proposed Rulemaking issued by the Commission in the above-captioned proceeding, which proposes revisions to the rules governing spectrum sharing among non-geostationary orbit (“NGSO”) fixed-satellite service (“FSS”) systems. SES, represented by Suzanne Malloy, Zach Rosenbaum, Kelsie Rutherford, Yan Tay, and outside counsel Karis Hastings, spoke with International Bureau (“IB”) Chief Tom Sullivan, IB Deputy Chief Troy Tanner, IB Assistant Chief Jennifer Gilsenan, Satellite Division Chief Karl Kensinger, Satellite Policy Branch Chief Merissa Velez, and Satellite Policy Branch Attorney Advisor Clay DeCell.

SES reiterated concerns expressed in its comments on the petition for rulemaking filed by Space Exploration Holdings, LLC proposing new and revised regulatory provisions to address spectrum sharing among NGSO FSS systems.¹ SES also noted that other countries are addressing similar NGSO sharing issues and may be interested in how the United States addresses this important subject.

Please address any questions regarding this matter to the undersigned.

¹ Space Exploration Holdings, LLC, Petition for Revision of Section 25.261 of the Commission’s Rules to Increase Certainty in Spectrum Sharing Obligations Among Non-Geostationary Orbit Fixed-Satellite Service Systems, RM-11855, filed Apr. 30, 2020.

Respectfully submitted,

/s/ Suzanne Malloy

Suzanne Malloy

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cc: Tom Sullivan
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